

1 GROOM LAW GROUP, CHARTERED

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10 *Special Counsel for Debtors*
11 *and Debtors in Possession*

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 **In re:**

Bankruptcy Case No. 19-30088 (DM)

16 **PG&E CORPORATION,**

Chapter 11

17 **- and -**

(Lead Case)

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

(Jointly Administered)

20 **Debtors.**

21 ☐ Affects PG&E Corporation

22 ☐ Affects Pacific Gas and Electric Company

23 ☒ Affects both Debtors

24 ** All papers shall be filed in the Lead Case*
25 *No. 19-30088 (DM).*

FIRST MONTHLY FEE STATEMENT OF
GROOM LAW GROUP, CHARTERED
FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF AUGUST 1, 2019
THROUGH AUGUST 31, 2019

Objection Deadline: December 23, 2019 at
4:00 p.m. (Pacific Time)

To: The Notice Parties

Name of Applicant Groom Law Group, Chartered

Authorized to Provide Professional Services to: Debtors

Date of Retention: June 10, 2019 nunc pro tunc to January 29, 2019

Period for which compensation and reimbursement are sought: August 1, 2019 through August 31, 2019

Amount of compensation sought as actual, reasonable, and necessary \$50,418.00 (80% of \$63,022.50)

Amount of expense reimbursement sought as actual, reasonable, and necessary \$0

The Groom Law Group, Chartered (“Groom” or “Applicant”), special employee benefits counsel to PG&E Corporation and Pacific Gas and Electric Company (“Debtors”), hereby submits its First Monthly Fee Statement (“First Monthly Statement”)¹ for allowance and payment of compensation for professional services rendered and for reimbursement of actual and necessary expenses incurred for the period commencing August 1, 2019, through August 31, 2019 (the “Fee Period”) pursuant to *the Order Pursuant to 11 U.S.C. §§ 331 and 105(a) and Fed. R. Bank. P. 2016 for Authority to Establish Procedures for Interim Compensation and Reimbursement of Expenses of Professionals dated February 27, 2019* [Dkt. 701] (the “Interim

¹ Groom filed its First Consolidated Monthly Fee Statement covering the period from January 29, 2019, to July 31, 2019, on September 27, 2019 [Dkt. No. 4031]. Groom filed a Certificate of No Objection with respect to the Consolidated Monthly Fee Statement on October 21, 2019 [Dkt. No. 4350].

1 Compensation Procedures Order”) and the *Order Appointing Fee Examiner And Establishing*
2 *Procedures For Consideration Of Requested Fee Compensation And Reimbursement Of*
3 *Expenses* [Dkt. 2267].
4

5 By this Monthly Statement, Groom requests allowance and payment of \$50,418.00 (80%
6 of \$63,022.50) as compensation for professional services rendered to the Debtors during the Fee
7 Period.
8

9 Groom provided legal services to Debtors related to five different matters during the Fee
10 Period. Attached hereto are the following Exhibits:
11

12 1. Matter A: Counseling re: Defined Benefit Plan

- 13 a. Exhibit A-1 is the name of each professional who performed services for one or
14 both of the Debtors in connection with these Chapter 11 cases during the Fee
15 Period and the hourly rate and total fees for each professional.
16
17 b. Exhibit A-2 is a summary of hours during the Fee Period by task.
18
19 c. Exhibit A-3 is the detailed time entries for the Fee Period.

20 2. Matter B: Counseling re: Defined Contribution Plan

- 21 a. Exhibit B-1 is the name of each professional who performed services for one or
22 both of the Debtors in connection with these Chapter 11 cases during the Fee
23 Period and the hourly rate and total fees for each professional.
24
25 b. Exhibit B-2 is a summary of hours during the Fee Period by task.
26
27 c. Exhibit B-3 is the detailed time entries for the Fee Period.
28

1 3. Matter C: Counseling re: Health and Welfare Plan

- 2 a. Exhibit C-1 is the name of each professional who performed services for one or
3 both of the Debtors in connection with these Chapter 11 cases during the Fee
4 Period and the hourly rate and total fees for each professional.
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6 b. Exhibit C-2 is a summary of hours during the Fee Period by task.
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8 c. Exhibit C-3 is the detailed time entries for the Fee Period.

9 4. Matter D: Counseling re: Bankruptcy Matter

- 10 a. Exhibit D-1 is the name of each professional who performed services for the
11 Debtors in connection with these Chapter 11 cases during the Fee Period and the
12 hourly rate and total fees for each professional.
13
14 b. Exhibit D-2 is a summary of hours during the Fee Period by task.
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16 c. Exhibit D-3 is the detailed time entries for the Fee Period.

17 5. Matter E: Voluntary Disability Plan

- 18 a. Exhibit E-1 is the name of each professional who performed services for the
19 Debtors in connection with these Chapter 11 cases during the Fee Period and the
20 hourly rate and total fees for each professional.
21
22 b. Exhibit E-2 is a summary of hours during the Fee Period by task.
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24 c. Exhibit E-3 is the detailed time entries for the Fee Period.

25 In accordance with the Interim Compensation Procedures Order, responses or objections
26 to this Monthly Statement, if any, must be filed and served on or before the 21st day (or the next
27 business day if such day is not a business day) following the date the Monthly Statement is
28 served with this Court (the “Objection Deadline”).

1 Upon expiration of the Objection Deadline, the Applicant shall file a certificate of no
2 objection with the Court, after which the Debtors are authorized and directed to pay the
3 Applicant an amount equal to 80% of the fees and 100% of the expenses requested in this
4 Monthly Statement. If an objection is properly filed, the Debtors shall be authorized and
5 directed to pay the Applicant 80% of the requested fees and 100% of the requested expenses that
6 are not subject to an objection.
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10 Dated: December 2, 2019

GROOM LAW GROUP, CHARTERED

11 By: /s/ Katherine B. Kohn
12 *Special Counsel for Debtors and*
13 *Debtors in Possession*
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Notice Parties

PG&E Corporation
c/o Pacific Gas & Electric Company
77 Beale Street
San Francisco, CA 94105
Attn: Janet Loduca, Esq.

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1 Bruce Markell
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EXHIBIT A-1

COMPENSATION BY PROFESSIONAL
AUGUST 1, 2019, THROUGH AUGUST 31, 2019

The attorneys and paraprofessionals who rendered professional services to one or more of the Debtors relating to the Defined Benefit Plan during the Fee Period are:

Names of Partners and Counsel	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Allison Ullman	2008	\$755	0.70	\$528.50
David Levine	1998	\$860	5.70	\$4,902.00
<i>Total Partners and Counsel</i>			<i>6.40</i>	<i>\$5,430.50</i>

Names of Associates	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Nancy McTyre (Legal Consultant)	2010	\$675	1.60	\$1,080.00
Stacey Bradford	1996	\$637	11.20	\$7,134.40
Mark Carolan	2010	\$675	0.30	\$202.50
Arsalan Malik	2015	\$504	0.20	\$100.80
<i>Total Associates</i>			<i>13.30</i>	<i>\$8,517.80</i>

Names of Paraprofessionals	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Josh Shapiro	--	\$751	0.50	\$375.50

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners and Counsel	\$848.51	6.40	\$5,430.50
Associates	\$640.43	13.30	\$8,517.80

Other Professionals and Paraprofessionals	\$751	0.50	\$375.50
Blended Attorney Rate	\$708.00		
<i>Total Fees Incurred</i>		<i>20.20</i>	<i>\$14,323.80</i>

EXHIBIT A-2

**COMPENSATION BY WORK TASK CODE FOR SERVICES
RENDERED ON MATTER DURING FEE PERIOD**

Task Code	Description	Hours	Amount
C200	Researching Law	20.20	\$14,323.70

EXHIBIT A-3

ITEMIZED SERVICES

Date	Timekeeper	Hours	Task	Narrative	Amount
8/5/2019	BRADFORD	0.10	C200	Revise paragraph for R. Reilly concerning litigation over actuarial factors.	\$63.70
8/5/2019	BRADFORD	0.10	C200	Review discussion concerning California law permitting state registration of opposite sex domestic partnerships.	\$63.70
8/7/2019	BRADFORD	2.30	C200	Draft email with options for amending Retirement Plan	\$1,465.10
8/12/2019	BRADFORD	0.90	C200	Review draft amendment for missing participants and post 70.5 adjustments issue.	\$573.30
8/13/2019	BRADFORD	2.00	C200	Draft writeup for missing participants amendment.	\$1,274.00
8/14/2019	BRADFORD	0.90	C200	Teleconference with administration team regarding administrative issues.	\$573.30
8/19/2019	BRADFORD	1.30	C200	Review proposed notice to participants re: solicitations on social media and website.	\$828.10
8/21/2019	BRADFORD	1.20	C200	Review and analyze questions regarding coverage of domestic partners and San Francisco and California requirements.	\$764.40
8/26/2019	BRADFORD	1.30	C200	Teleconference with R. Reilly and A. Ullman regarding domestic partner benefits	\$828.10
8/30/2019	BRADFORD	1.10	C200	Prepare for administration conference call with client team.	\$700.70
8/16/2019	CAROLAN	0.30	C200	Review question regarding alternative premium funding target election process on PBGC portal.	\$202.50
8/4/2019	LEVINE	0.20	C200	Prepare write-up re: current lawsuits.	\$172.00

8/5/2019	LEVINE	0.30	C200	Actuarial lawsuit EBC write-up follow-up.	\$258.00
8/12/2019	LEVINE	0.30	C200	Review open plan amendment items.	\$258.00
8/13/2019	LEVINE	0.30	C200	Follow-up on current pension plan amendment items.	\$258.00
8/14/2019	LEVINE	0.30	C200	Pension plan amendment summary follow-up.	\$258.00
8/14/2019	LEVINE	0.70	C200	Call with R. Reilly, L. Laanisto.	\$602.00
8/14/2019	LEVINE	0.70	C200	Prepare/revise talking points.	\$602.00
8/14/2019	LEVINE	0.70	C200	Follow-up on plaintiffs inquiry.	\$602.00
8/18/2019	LEVINE	0.50	C200	Actuarial lawsuits follow-up.	\$430.00
8/19/2019	LEVINE	1.00	C200	Actuarial lawsuits follow-up; review plan amendment and write-up.	\$860.00
8/20/2019	LEVINE	0.20	C200	EBC write-up follow-up with SAB.	\$172.00
8/21/2019	LEVINE	0.20	C200	Arbitration decision follow-up.	\$172.00
8/31/2019	LEVINE	0.30	C200	Follow-up on Excess Benefit Plan DRO.	\$258.00
8/20/2019	MALIK	0.20	C200	Review EBC fiduciary file.	\$100.80
8/21/2019	MCTYRE	1.30	C200	Draft write up of Schwab case re: arbitration.	\$877.50
8/22/2019	MCTYRE	0.30	C200	Revise write up of Schwab case re: arbitration.	\$202.50
8/4/2019	SHAPIRO	0.50	C200	Review actuarial equivalence lawsuit summary.	\$375.50
8/21/2019	ULLMAN	0.10	C200	Call with R. Reilly re: domestic partnership questions.	\$75.50
8/22/2019	ULLMAN	0.30	C200	Follow-up work re: Domestic partnership issues.	\$226.50
8/26/2019	ULLMAN	0.30	C200	Call with R. Reilly and SB re: Domestic partnership issue.	\$226.50
GRAND TOTAL					\$14,323.70

EXHIBIT B-1

COMPENSATION BY PROFESSIONAL
AUGUST 1, 2019, THROUGH AUGUST 31, 2019

The attorneys and paraprofessionals who rendered professional services to one or both of the Debtors relating to the Debtors' Defined Contribution Plan ("RSP") during the Fee Period are:

Name of Professional Partners and Counsel	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Katie Amin	2009	\$713	0.10	\$71.30
Allison Itami	2009	\$713	1.00	\$713.00
David Levine	1998	\$860	0.40	\$344.00
Allison Ullman	2008	\$755	1.60	\$1,208.00

Names of Associates	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
John Barlow	2015	\$561	0.50	\$280.50
Stacey Bradford	1996	\$637	0.60	\$382.20

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners and Counsel	\$753.64	3.10	\$2,336.30
Associates	\$602.45	1.10	\$662.70
Blended Attorney Rate	\$650.63		
<i>Total Fees Incurred</i>		<i>4.20</i>	<i>\$2,999.00</i>

EXHIBIT B-2

**COMPENSATION BY WORK TASK CODE FOR SERVICES
RENDERED DURING THE FEE PERIOD**

Task Code	Description	Hours	Amount
C200	Researching Law	4.20	\$2,999.00

EXHIBIT B-3

ITEMIZED SERVICES

Date	Timekeeper	Hours	Task	Narrative	Amount
8/21/2019	AMIN	0.10	C200	Review question re: domestic partner coverage.	\$71.30
8/22/2019	BARLOW	0.50	C200	Draft/revise email re: domestic partners	\$280.50
8/1/2019	BRADFORD	0.30	C200	Email R. Reilly and M. Parry re: benefits of participant reinstated in arbitration.	\$191.10
8/13/2019	BRADFORD	0.30	C200	Review question concerning suspension of deferrals for hardship withdrawal and participant's request to make up missed deferrals.	\$191.10
8/21/2019	ITAMI	1.00	C200	Review arbitration case for plan implications.	\$713.00
8/15/2019	LEVINE	0.20	C200	Follow-up on incongruent election question.	\$172.00
8/22/2019	LEVINE	0.20	C200	Review and follow-up re: NAV correction item.	\$172.00
8/21/2019	ULLMAN	0.10	C200	Call with R. Reilly re: domestic partnership questions.	\$75.50
8/21/2019	ULLMAN	0.20	C200	Follow-up work re: R. Reilly's domestic partnership questions.	\$151.00
8/22/2019	ULLMAN	0.40	C200	Follow-up work re: domestic partnership issues.	\$302.00
8/23/2019	ULLMAN	0.10	C200	Follow-up work re: domestic partnership questions.	\$75.50
8/26/2019	ULLMAN	0.40	C200	Call with R. Reilly and SB re: domestic partnership issue.	\$302.00
8/26/2019	ULLMAN	0.40	C200	Prepare for call with client re: domestic partnership issue.	\$302.00
GRAND TOTAL					\$2,999.00

EXHIBIT C-1

COMPENSATION BY PROFESSIONAL
AUGUST 1, 2019, THROUGH AUGUST 31, 2019

The attorneys and paraprofessionals who rendered professional services to one or both of the Debtors related to Health and Welfare Plans during the Fee Period are:

Name of Professional Partners and Counsel	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Elizabeth Dold	1995	\$898	0.80	\$718.40
Allison Itami	2009	\$713	1.40	\$998.20
Katy Kamen	1990	\$751	0.20	\$150.20
David Levine	1998	\$860	0.70	\$602.00
Christy Tinnes	1998	\$812	0.20	\$162.40
Allison Ullman	2008	\$755	1.80	\$1,359.00
Joel Wood	2009	\$713	0.20	\$142.60

Names of Associates	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Stacey Bradford	1996	\$637	1.30	\$828.10
Arsalan Malik	2015	\$504	0.20	\$100.80

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners and Counsel	\$779.77	5.30	\$4,132.80
Associates	\$619.26	1.50	\$928.90
Blended Attorney Rate	\$744.36		
Total Fees Incurred		6.80	\$5,061.70

EXHIBIT C-2

**COMPENSATION BY WORK TASK CODE FOR SERVICES
RENDERED DURING THE FEE PERIOD**

Task Code	Description	Hours	Amount
C200	Researching Law	6.80	\$5,061.70

EXHIBIT C-3

ITEMIZED SERVICES

Date	Timekeeper	Hours	Task	Narrative	Amount
8/22/2019	BRADFORD	1.30	C200	Review benefit issues for retiree who was reinstated retroactively.	\$828.10
8/15/2019	DOLD	0.80	C200	Review assignment issue.	\$718.40
8/29/2019	ITAMI	1.40	C200	Review / prepare AD&D amendment.	\$998.20
8/23/2019	KAMEN	0.10	C200	Review issues re: health and retirement benefits for domestic partners.	\$75.10
8/23/2019	KAMEN	0.10	C200	Draft email re: health plan benefits for domestic partners.	\$75.10
8/2/2019	LEVINE	0.50	C200	Sick pay taxation follow-up.	\$430.00
8/4/2019	LEVINE	0.20	C200	Review LTD call notes and follow-up with KBA.	\$172.00
8/29/2019	MALIK	0.20	C200	Review 2015 Group Life Insurance Plan restatement.	\$100.80
8/22/2019	TINNES	0.20	C200	Emails re coverage for domestic partners.	\$162.40
8/4/2019	ULLMAN	0.20	C200	Review/analysis re: new California domestic partner law.	\$151.00
8/21/2019	ULLMAN	0.10	C200	Call with R. Reilly re: domestic partnership questions.	\$75.50
8/21/2019	ULLMAN	0.10	C200	Follow-up work re: R. Reilly's domestic partnership questions.	\$75.50
8/22/2019	ULLMAN	0.40	C200	Follow-up work re: domestic partnership issues.	\$302.00
8/22/2019	ULLMAN	0.10	C200	Review question from SB re: retroactive employment	\$75.50

				reinstatement and health benefits.	
8/23/2019	ULLMAN	0.10	C200	Follow-up work re: domestic partnership questions.	\$75.50
8/26/2019	ULLMAN	0.30	C200	Call with R. Reilly and SB re: domestic partnership issue.	\$226.50
8/26/2019	ULLMAN	0.10	C200	Review question from SB re: retroactive employment reinstatement and health benefits.	\$75.50
8/26/2019	ULLMAN	0.40	C200	Prepare for call with client re: domestic partnership issue.	\$302.00
8/22/2019	WOOD	0.10	C300	Draft correspondence and analysis regarding same.	\$71.30
8/22/2019	WOOD	0.10	C300	Review and analyze correspondence and questions regarding domestic partners.	\$71.30
		6.80			\$5,061.70

EXHIBIT D-1

COMPENSATION BY PROFESSIONAL
AUGUST 1, 2019, THROUGH AUGUST 31, 2019

The attorneys and paraprofessionals who rendered professional services to the Debtors in connection with benefits issues related to bankruptcy (2018 Wildfires) during the Fee Period are:

Name of Professional Partners and Counsel	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Michael Del Conte	2008	\$713	1.80	\$1,283.40
Dan Hogans	1999	\$836	0.40	\$334.40
Allie Itami	2009	\$713	14.60	\$10,409.80
Katherine Kohn	2009	\$708	2.80	\$1,982.40
David Levine	1998	\$860	15.80	\$13,588.00

Names of Associates	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Stacey Bradford	1996	\$637	2.60	\$1,656.20
Mark Carolan	2010	\$675	0.30	\$202.50
Ross McSweeney	2012	\$637	11.90	\$7,580.30

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners and Counsel	\$779.60	35.40	\$27,598.00
Associates	\$637.77	14.80	\$9,439.00
Blended Attorney Rate	\$737.78		

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<i>Total Fees Incurred</i>		<i>50.20</i>	<i>\$37,037.00</i>
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EXHIBIT D-2

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED DURING
THE FEE PERIOD**

Task Code	Description	Hours	Amount
C200	Researching Law	<i>50.20</i>	<i>\$37,037.00</i>

EXHIBIT D-3

ITEMIZED SERVICES

Date	Timekeeper	Hours	Task	Narrative	Amount
8/1/2019	BRADFORD	0.50	C200	Review and analyze pension accruals and possible updates during bankruptcy restrictions.	\$318.50
8/2/2019	BRADFORD	1.00	C200	Review and analyze options for pension accrual amendment.	\$637.00
8/6/2019	BRADFORD	0.10	C200	Draft retirement plan update summary.	\$63.70
8/30/2019	BRADFORD	1.00	C200	Review and analyze DRO for retiree's Excess Plan benefit.	\$637.00
8/12/2019	CAROLAN	0.30	C200	Review draft retirement plan amendment write-up.	\$202.50
8/23/2019	DEL CONTE	1.00	C200	Review and respond to QDIA question.	\$713.00
8/28/2019	DEL CONTE	0.80	C200	Review 404a-5 and QDIA notices.	\$570.40
8/26/2019	HOGANS	0.40	C200	Analysis and advice re: requirements for FICA/HI tax collection on nonqualified deferred compensation.	\$334.40
8/9/2019	ITAMI	1.50	C200	Analyze concerns regarding rights offering as impacting the retirement plan.	\$1,069.50
8/14/2019	ITAMI	0.50	C200	Provide update on ESOP cases for public companies.	\$356.50
8/15/2019	ITAMI	0.80	C200	Review documents related to plan stock limitations.	\$570.40
8/16/2019	ITAMI	1.00	C200	Review participant communication drafts about and attend group call regarding stock fund investment limitations.	\$713.00
8/20/2019	ITAMI	2.00	C200	Revise required legal notices regarding stock limitations.	\$1,426.00
8/22/2019	ITAMI	0.50	C200	Discuss Fidelity's implementation of stock limitation.	\$356.50

1	8/23/2019	ITAMI	1.50	C200	Attend call regarding stock fund limitation and notices regarding same.	\$1,069.50
2						
3	8/26/2019	ITAMI	1.00	C200	Review participant notices regarding stock fund limitation.	\$713.00
4	8/28/2019	ITAMI	1.00	C200	Review incongruity update from J. Redmond.	\$713.00
5						
6	8/28/2019	ITAMI	1.00	C200	Review and discuss rights offering considerations in connection with stock fund.	\$713.00
7						
8	8/29/2019	ITAMI	2.00	C200	Review and discuss rights offering considerations in connection with stock fund.	\$1,426.00
9						
10	8/29/2019	ITAMI	1.00	C200	Review stock limitation implementation timing and notice questions.	\$713.00
11						
12	8/30/2019	ITAMI	0.80	C200	Review communications regarding stock limitation notices.	\$570.40
13						
14	8/5/2019	KOHN	0.20	C200	Call with R. Foust and DNL re: fee application issues.	\$141.60
15	8/12/2019	KOHN	0.10	C200	Review issues re: retirement plan amendments	\$70.80
16	8/20/2019	KOHN	0.30	C200	Call with outside counsel re: benefits issues.	\$212.40
17						
18	8/20/2019	KOHN	0.10	C200	Analyze B-AFTAP certification.	\$70.80
19	8/24/2019	KOHN	0.50	C200	Review issues re: fee application.	\$354.00
20						
21	8/27/2019	KOHN	0.80	C200	Review issues re: AB 1054 impact on benefit plans.	\$566.40
22	8/27/2019	KOHN	0.80	C200	Attend weekly benefits call.	\$566.40
23	8/1/2019	LEVINE	0.80	C200	Review Company stock open items and Gallagher follow-up.	\$688.00
24	8/1/2019	LEVINE	0.40	C200	Bankruptcy billing and follow-up.	\$344.00
25						
26	8/2/2019	LEVINE	0.40	C200	Follow-up re: retirement plan amendments.	\$344.00
27	8/5/2019	LEVINE	0.50	C200	Follow-up re: billing and call with Weil, R. Reilly re: billing.	\$430.00
28	8/6/2019	LEVINE	0.20	C200	Communicate with counsel re: plan design.	\$172.00
	8/7/2019	LEVINE	0.50	C200	Follow-up re: plan design with R. Reilly.	\$430.00

1	8/8/2019	LEVINE	0.40	C200	Plan design items follow-up.	\$344.00
2	8/9/2019	LEVINE	0.80	C200	Review and follow-up re: 13D question.	\$688.00
3	8/15/2019	LEVINE	0.20	C200	Review and follow-up re: corporate director LTD.	\$172.00
4	8/15/2019	LEVINE	0.40	C200	Company stock timeline follow-up.	\$344.00
5	8/16/2019	LEVINE	1.00	C200	Call and follow-up re: stock implementation.	\$860.00
6	8/16/2019	LEVINE	0.10	C200	Company stock timeline follow-up.	\$86.00
7	8/18/2019	LEVINE	0.20	C200	Follow-up on benefit restrictions communication.	\$172.00
8	8/19/2019	LEVINE	0.40	C200	Retirement plan amendment options follow-up.	\$344.00
9	8/20/2019	LEVINE	0.60	C200	Retirement plan amendment prep and discuss with team.	\$516.00
10	8/21/2019	LEVINE	0.50	C200	Review and follow-up re: stock fund transition items.	\$430.00
11	8/22/2019	LEVINE	1.00	C200	Review materials from Fidelity and prepare for call with AAI.	\$860.00
12	8/23/2019	LEVINE	0.50	C200	Review invoices for bankruptcy fee submission.	\$430.00
13	8/23/2019	LEVINE	0.50	C200	Review notice requirements and MDC analysis.	\$430.00
14	8/23/2019	LEVINE	0.50	C200	Follow-up re: stock call with MDC	\$430.00
15	8/26/2019	LEVINE	0.50	C200	Follow-up on company stock matters.	\$430.00
16	8/27/2019	LEVINE	0.20	C200	Retirement plan amendment follow-up.	\$172.00
17	8/27/2019	LEVINE	0.40	C200	Begin review of AB 1054.	\$344.00
18	8/28/2019	LEVINE	2.30	C200	Review legislation and stock follow-up items.	\$1,978.00
19	8/29/2019	LEVINE	1.00	C200	Legislation follow-up.	\$860.00
20	8/29/2019	LEVINE	1.00	C200	Follow-up with R. Reilly re: 13D filing and bankruptcy follow-up.	\$860.00
21	8/29/2019	LEVINE	0.50	C200	Review company stock items.	\$430.00
22	8/13/2019	MCSWEENEY	2.70	C200	Revise draft combined fee application to include unbilled invoices for June and July 2019.	\$1,719.90
23	8/21/2019	MCSWEENEY	0.90	C200	Revise draft fee application to include additional time, and	\$573.30

				review for confidentiality/privilege concerns.	
8/22/2019	MCSWEENEY	1.10	C200	Revise draft fee application to include additional time, and review for confidentiality/privilege concerns.	\$700.70
8/23/2019	MCSWEENEY	2.70	C200	Revise draft fee application to include additional time, and review for confidentiality/privilege concerns.	\$1,719.90
8/24/2019	MCSWEENEY	1.20	C200	Revise draft fee application to include additional time, and review for confidentiality/privilege concerns.	\$764.40
8/28/2019	MCSWEENEY	2.10	C200	Revise draft fee application to include additional time, and review for confidentiality/privilege concerns.	\$1,337.70
8/30/2019	MCSWEENEY	1.20	C200	Revise draft fee application to include additional time, and review for confidentiality/privilege concerns.	\$764.40
GRAND TOTAL					\$37,037.00

EXHIBIT E-1

COMPENSATION BY PROFESSIONAL
AUGUST 29, 2019, THROUGH AUGUST 31, 2019

The attorneys and paraprofessionals who rendered professional services to the debtors relating to the Voluntary Disability Plan during the Fee Period are:

Names of Partners and Counsel	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
David Levine	1998	\$860	0.50	\$430.00
Allison Ullman	2008	\$755	4.20	\$3,171.00
<i>Total Partners and Counsel</i>			<i>4.70</i>	<i>\$3,601.00</i>

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners and Counsel	\$766.17	4.70	\$3,601.00
Blended Attorney Rate	\$766.17		
<i>Total Fees Incurred</i>			<i>\$3,601.00</i>

EXHIBIT E-2

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED ON
MATTER DURING FEE PERIOD**

Task Code	Description	Hours	Amount
C200	Researching Law	4.70	\$3,601.00

EXHIBIT E-3

ITEMIZED SERVICES

Date	Timekeeper	Hours	Task	Narrative	Amount
8/23/2019	LEVINE	0.50	C200	Review VP letters from AU and review draft communication.	\$430.00
8/1/2019	ULLMAN	0.30	C200	Correspondence with client re: VP documents and EDD.	\$226.50
8/2/2019	ULLMAN	0.50	C200	Circulate documents to EDD re: VP issue.	\$377.50
8/19/2019	ULLMAN	0.20	C200	Follow-up correspondence with EDD re: VP issue.	\$151.00
8/22/2019	ULLMAN	0.10	C200	Review correspondence from client re: VP letters.	\$75.50
8/23/2019	ULLMAN	3.00	C200	Review draft VP letters.	\$2,265.00
8/26/2019	ULLMAN	0.10	C200	Call with R. Reilly re: VP letters.	\$75.50
GRAND TOTAL					\$3,601.00